

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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BRIAN XIONG,

Plaintiff,

v.

Case No. 20CV0242

BOARD OF REGENTS OF THE  
UNIVERSITY OF WISCONSIN SYSTEM,

Defendant.

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**DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS FOR JURY PANEL**

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Defendant, The Board of Regents of the University of Wisconsin System, respectfully requests the Court to ask the following questions in addition to the Court's standard voir dire questions to the jury panel:

1. Have you, or someone close to you, ever had to terminate, lay-off, or discipline an employee?
  - a. If yes, please explain.
  - b. Would that/those incidents make it difficult for you to sit as an impartial juror in this case, which involves the termination of an employee?
2. Have you, or someone close to you, ever been terminated, laid off, or disciplined by your employer?
  - a. If yes, please explain.

- b. Would that/those incidents make it difficult for you to sit as an impartial juror in this case, which involves the termination of an employee?
3. Does anyone have a strong view that an individual who holds a terminal degree, e.g. EdD or PhD, is superior in intelligence than someone who is a holds less than a terminal degree?
4. Does anyone have a strong view that an individual who holds a less than a terminal degree should not supervise someone who holds a terminal degree?
  - a. If yes, please explain.
  - b. Would that view make it difficult for you to sit as an impartial juror in this case?
5. Have you ever felt that your employer discriminated against you based on your race, national origin, age, sex, ancestry, or religion?
  - a. If yes, please explain.
  - b. Would that/those incidents make it difficult for you to sit as an impartial juror in this case, which involves the Plaintiff's claim that he was retaliated against for making a claim about discrimination in the workplace?
6. Have you, or someone close to you, ever filed a grievance or complaint against your employer or supervisor, such as an employment discrimination or retaliation claim?
  - a. If yes, please explain.
  - b. Would that/those incidents make it difficult for you to sit as an impartial juror in this case, which involves the Plaintiff's claim that his employer retaliated against him for making a claim about discrimination in the workplace?

7. Have you, or someone close to you, ever been accused of discriminating against another person in the workplace?

- a. If yes, please explain.
- b. Would that/those incidents make it difficult for you to sit as an impartial juror in this case, which involves the Plaintiff's claim that his employer retaliated against him for making a claim about discrimination in the workplace?

8. Have you, or someone close to you, ever participated as a witness in an employment grievance, claim, or complaint, whether for or against your employer?

- a. If yes, please explain.
- b. Would that/those incidents make it difficult for you to sit as an impartial juror in this case, which involves the Plaintiff's claim that his employer retaliated against him for making a claim about discrimination in the workplace?

9. Does anyone have a strong positive or negative view about laws which prohibit discrimination or people who file discrimination claims?

- a. If yes, please explain.
- b. Would that/those view(s) make it difficult for you to sit as an impartial juror in this case?

10. Have you, or someone close to you, ever been involved in a dispute with the State of Wisconsin, including one of its departments or agencies?

- a. If yes, please explain.
- b. Would that/those incident(s) make it difficult for you to sit as an impartial juror in this case, where the Board of Regents of the University of Wisconsin System is a party?

11. Does anyone have a strong positive or negative view about the University of Wisconsin System?

- a. If yes, please explain.
- b. Would that/those incident(s) make it difficult for you to sit as an impartial juror in this case, where the Board of Regents of the University of Wisconsin System is a party?

12. Have you or any members of your family or close friends ever been employed by the University of Wisconsin System?

13. The Defendant is represented by the Wisconsin Department of Justice. Is there anyone who has negative feelings about that Department or the Attorney General Josh Kaul?

Dated: August 11, 2023

Respectfully submitted,

JOSHUA L. KAUL  
Attorney General of Wisconsin

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